EXHIBIT A

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL	§
LEAGUE PLAYERS' CONCUSSION	§
LITIGATION	§
	§ No. 12-md-2323 (AB)
KEVIN TURNER & SHAWN WOODEN	§ MDL No. 2323
on behalf of themselves and others similarly	§
situated	§ Civ. Action No. 14-00029-AB
	§
v.	8
	§
National Football League and	§
NFL Properties LLC,	§
successor-in-interest to NFL Properties, Inc.	§
	§
	8
	2 2
THE DOCUMENT DELATES TO	8
THIS DOCUMENT RELATES TO:	8
ALL ACTIONS	§

DECLARATION OF RICHARD L. COFFMAN IN SUPPORT OF THE ARMSTRONG OBJECTORS' PETITION FOR AWARD OF ATTORNEYS' FEES

Pursuant to 28 U.S.C. § 1746, I, Richard L. Coffman, declare as follows:

1. I am an attorney in good standing licensed to practice law in the State of Texas. I am also admitted to practice in the United States District Courts for the Eastern, Western, Northern, and Southern Districts of Texas, the Central and Southern Districts of Illinois, the Eastern District of Michigan, the United States Court of Appeals for the First, Third, Fifth, Sixth, Seventh, and Ninth Circuits, the United States Court of Federal Claims, and the United States Supreme Court. I also have been, and am, admitted *pro hac vice* in various other state and federal courts throughout the United States.

- 2. I am a shareholder in, and President of, the Coffman Law Firm in Beaumont, Texas. I am also a Certified Public Accountant. I have practiced law for over twenty-seven years. I am AV peer review rated by the Martindale-Hubbell Law Directory, a Texas Super Lawyer, and rated Superb by Avvo. For my entire law career, my practice has focused on business cases, consumer cases, complex commercial litigation, class actions, and mass actions in state and federal courts throughout the United States. For more information about the Coffman Law Firm and my law practice, please visit my Firm website, www.coffmanlawfirm.com.
- 3. I am Co-Counsel for the group of Objectors known as the "Armstrong Objectors" who are identified in their Petition for an Award of Attorneys' Fees and Supporting Memorandum of Law. I have personal knowledge of the statements in this Declaration and, if called as a witness, I could, and would, testify competently them. I make this Declaration in support of the Armstrong Objectors' Petition for an Award of Attorneys' Fees and Supporting Memorandum of Law.
- 4. As Co-Counsel for the Armstrong Objectors in this matter, I, assisted by my staff where appropriate, (i) reviewed the June 25, 2014 Class Action Settlement Agreement that was subsequently amended to become the Final Settlement approved by the Court, (ii) met with and counseled clients and other Class Members over the phone regarding the Final Settlement, their concerns about it, and objections to it, (iii) researched and drafted the Armstrong Objectors' Objection, Amended Objection, and Supplemental Objection to the Final Settlement, (iv) reviewed the Court's order and opinion giving final approval to the Final Settlement, (v) conferred and communicated with the Armstrong Objectors, other Class Members, and cocounsel about the Court's approval of the Final Settlement and appealing the approval order to the Third Circuit Court of Appeals, (vi) worked with Co-Counsel to review and edit the Armstrong Objectors' appellate briefs filed in the Third Circuit, (vii) attended the November 19,

2015 oral argument in the Third Circuit and subsequently advised the Armstrong Objectors and other Class Members about it, (viii) reviewed the Third Circuit' opinion, and conferred and communicated with the Armstrong Objectors and co-counsel about appealing the decision to the United States Supreme Court, (ix) worked with Co-Counsel to review and edit the Armstrong Objectors' petition for writ of *certiorari* filed in the Supreme Court, (x) advised the Armstrong Objectors and other Class Members about its denial, and (xi) counseled the Armstrong Objectors and other Class Members about their post-denial options and potential benefits under the Final Settlement once it became effective on January 7, 2017.

- 5. The above-described work performed by my Firm (working with Co-Counsel) on behalf of the Armstrong Objectors benefitted all Class Members by (i) transforming the settlement process into a true adversarial proceeding, (ii) enhancing the Final Settlement by opening up the Baseline Assessment Program for all eligible Class Members, expanding the eligibility period for Death with CTE benefits, and securing a waiver of the \$1000 appeal fee for good cause, and (iii) in the process, delivering the Collateral Time Benefit—which provided Class Members with over nineteen months of additional time to be examined by their own board certified neurospecialist physician for purposes of securing a Qualified Diagnosis and receiving a monetary award under the Final Settlement. As a result of the above-described work performed by my Firm (working with Co-Counsel), the Final Settlement was significantly enhanced for the benefit of all Class Members.
- 6. My Firm spent three years working on behalf of the Armstrong Objectors to enhance the Final Settlement for the benefit of all Class Members. In doing so, my Firm (i) spent 411.50 hours, yielding a lodestar of \$\$233,630 of attorneys' fees at my Firm's current hourly billing rates for this type of litigation, and (ii) advanced \$32,031.40 of out-of-pocket expenses. A

Lodestar Summary of the time spent by Firm's attorneys and paralegals working on this matter and their billing rates is attached as Exhibit A.

7. Throughout the litigation, my staff and I maintained contemporaneous daily time records of the time and expenses incurred. My Firm's lodestar is based solely upon my Firm's billing rates, which do not include charges for expense items. Expense items are billed separately and are not duplicated in my Firm's billing rates.

8. My Firm represented the Armstrong Objectors on a 100% contingency basis, assuming full risk of non-payment. That said, I only seek an award of my Firm's straight time hourly fees (\$233,630) with no multiplier. The time incurred to prepare the Armstrong Objectors' Petition for an Award of Attorneys' Fees, Supporting Memorandum of Law, and this Declaration is not included in my requested fee award. I do not seek reimbursement of the out-of-pocket expenses advanced by my Firm representing the Armstrong Objectors for the benefit of all Class Members.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 1, 2017, at Beaumont, Texas.

Richard L. Coffman

EXHIBIT A

IN RE: NFL PLAYERS' CONCUSSION INJURY LITIGATION No. 12-md-2323-AB

THE COFFMAN LAW FIRM LODESTAR SUMMARY

January 2014-January 2017

NAME	HOURS	HOURLY RATE	AMOUNT
PARTNER			
Richard L. Coffman	308.75	\$700	\$216,125.00
ASSOCIATES			
Doneane Beckom	46.50	\$195	\$9,067.50
PARALEGALS			
Alexis Pace	32.25	\$150	\$4,837.50
Heather McAdams	24.00	\$150	\$3,600.00
Totals	411.50	-	\$233,630.00